BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001 RECEIVED

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK TO INTERROGATORIES OF MAJOR MAILERS ASSOCIATION (MMA/USPS-T43-11-12, 13 a-g, 14-17, 18 a-b)

The United States Postal Service hereby moves for late acceptance of the responses of witness Schenk to MMA/USPS-T43-11-12, 13 a-g, 14-17, 18 a-b, filed today. These responses were due to be filed November 30, six calendar days ago. The answers require the retrieval and evaluation of archived data that still has not been completed. Rather than delay the responses further, those that can be answered are being filed today. The Postal Service regrets the delay, but offers that no party has been prejudiced by it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

K. Mcane

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-3089 Fax -5402 December 6, 2001

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 December 6, 2001